Columbia River Inter-Tribal Fish Commission

729 NE Oregon St.
Suite 200
Portland, OR 97232

t • (503) 238-0667
f • (503) 235-4228
i • www.critfc.org

TO Wallace Reid Chip Humphrey (EPA)

FROM Patti Howard (CRITFC)

DATE May 9 2002

RE CRITFC Staff Comments on the Draft Sampling and Analysis Plan, April 22, 2002

General Comments

We have two over arching concerns regarding the proposed Field Sampling Plan Round 1A Portland Harbor RI/FS First insufficient time has been allotted for review In the future these studies must be prepared with adequate lead time to allow for meaningful review and discussion between all parties Second these studies need to be presented in the context of the comprehensive long term data gathering needs for the project Baseline Risk Assessment For example How do these studies fit into the Conceptual Site Model? How do these studies help answer the questions of pathways exposure and impacts to humans or aquatic organisms? What are the short and long term project data goals? A directed rather than random approach will facilitate data collection and better address the issue of chemical exposure at the Portland Harbor Site

Specific Comments

Task 1 Mark and Recapture Study of Sub Yearling Chinook Salmon

The proposed study is very limited in its ability to draw conclusions regarding salmon residency time and contaminant exposure Therefore caution must be used when applying this data to the broader issue of risk at the Portland Harbor Site

- The study has a narrow focus limiting the ability to extrapolate the findings to the broader population and residence time
- Do these populations (above Willamette falls lower Clackamas River) represent the only fall chinook populations in the Willamette watershed?
- What proportion of the total migrating juvenile population does the 10 000 fish sample size represent (i e what is the total migrating fall chinook juvenile population)?
- For the total of 10 000 fish tagged the proposed 141 recaptures seems optimistic especially considering the size and volume of the river and the limited number of recapture crews
- No information is provided on juvenile migration (i e in what portions of the river do they migrate at what depths do they migrate what is the river flow rate what are the diel patterns of migration)
- Electrofishing is not very effective for small fish (limited depth) and is typically lethal for salmonids
- Electrofishing is a non target source of capture and would have the potential to kill not only a significant number of the target populations (including listed Clakamas juveniles) but also other fish including migrating juvenile (heading down stream) migrating adult (heading upstream) and spring chinook salmon from up river populations
- The data gathered in this proposed study would only provide information on the length of time it takes a juvenile sub yearling to get from the mark site to the recapture site The data will not provide information on how long juveniles spend

in and around the Superfund Site nor achieve the goal of a "better understanding habitat preferential use."

- Major concern: The choice of electrofishing for recoveries and the associated target and non-target salmonid mortality, and the likelihood that 141 juveniles can be recovered in such a large river using almost any recapture technique.

- The study does not address the impact to fish of contaminants that do not accumulate in tissue.
- The study does not address the issue of sublethal impacts such as indirect effects (e.g., food chain disruption, habitat loss), immune system effects or endocrine disruption resulting from chemical exposure.

For these reasons, the proposed study should be viewed as a pilot study only with the purpose to test methodologies.

Task 3: Reconnaissance Survey of hard-Bottom Benthic Communities Using Mulitplates
Would like clarification on when and where soft-bottom benthic samples will be collected.

Task 4: Reconnaissance Survey of Aquatic Plants and Amphibians
Recommend that PRPs document and collect macroinvertebrate samples found on aquatic plants.

Task 5: Reconnaissance Survey of Lamprey Species During Annual Harvest
CRITFC and ODFW are co-mangers of the Willamette River lamprey fishery. The PRPs need to coordinate their proposed work with CRITFC and ODFW. Contacts: Mike Matylewich Manager, Fish Management Department at CRITFC (503-238-0667) and Steve King, ODFW (503-872-5252, ext. 5391).